

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

In re VALEANT PHARMACEUTICALS
INTERNATIONAL, INC. SECURITIES
LITIGATION

**Master File No. 3:15-cv-07658
(MAS) (LHG)**

This Document Relates To:

**STIPULATION AND
ORDER EXTENDING THE VAC
DEFENDANTS' TIME TO ANSWER
THE FIRST AMENDED COMPLAINT**

No. 3:15-CV-07658 MAS-LHG

This Stipulation is entered into between Lead Plaintiff TIAA (“Lead Plaintiff”) and Defendants ValueAct Capital Management L.P., VA Partners I, LLC, ValueAct Holdings, L.P., ValueAct Capital Master Fund, L.P., ValueAct Co-Invest Master Fund, L.P., and Jeffrey W. Ubben (collectively, the “VAC Defendants”).

WHEREAS, Lead Plaintiff filed a First Amended Consolidated Complaint (the “FAC”) in the above-captioned action on September 20, 2018 (ECF No. 352);

WHEREAS, the VAC Defendants moved to dismiss the FAC’s claims against them on October 31, 2018 (ECF No. 387);

WHEREAS, the Court denied the VAC Defendants’ motion on June 30, 2019 (ECF Nos. 462, 463);

WHEREAS, the VAC Defendants intend to file an answer to the FAC;

WHEREAS, the VAC Defendants have until July 15, 2019 to answer the FAC under Federal Rule of Civil Procedure 12(a)(4)(A);

WHEREAS, the VAC Defendants require additional time to prepare their answer to Plaintiffs’ FAC given its 765-paragraph length and the intervening July 4th holiday; and

WHEREAS, counsel for Lead Plaintiff consents to the VAC Defendants' request to extend their deadline to answer the FAC by twenty-one days;

IT IS HEREBY STIPULATED AND AGREED by the undersigned that the VAC Defendants' time to answer the FAC is extended to August 5, 2019.

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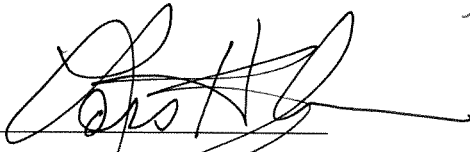
*Counsel for Defendants Jeffrey W. Ubben,
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Counsel for Lead Plaintiff TIAA

SO ORDERED, on this 15th day of July, 2019.



Hon. Lois H. Goodman, U.S.M.J.